

Paul T. Trimmer
Nevada State Bar No. 9291
Holly E. Walker
Nevada State Bar No. 14295
JACKSON LEWIS P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Tel: (702) 921-2460
Email: paul.trimmer@jacksonlewis.com
Email: holly.walker@jacksonlewis.com

*Attorneys for Defendant
M1 Support Services, L.P.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TIAWNA FINCH, an individual,

Plaintiff,

vs.

M1 SUPPORT SERVICES, L.P., a Texas limited
partnership; DOES 1-10, business entities, forms
unknown; DOES 11-20, individuals; and DOES
21-30, inclusive,

Defendants.

Case No.: 2:21-cv-00669-RFB-NJK

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)**

All parties of record participated in the meeting required under Fed. R. Civ. P. 26(f) and which was held on **June 2, 2021**. Pursuant to Fed. R. Civ. P. 26(f) and LR 26-1(e), the parties do hereby stipulate to the following discovery plan and scheduling order.

1. **Initial Disclosures:** The initial disclosures to be made pursuant to Fed. R. Civ. P. 26(a)(1) shall be made by **June 23, 2021**.

2. **Discovery Cut-Off Date(s):** Discovery will take 180 days, measured from May 17, 2021, which is the date Defendant answered or otherwise appeared in the case. This does not exceed the 180 days presumptive outside limit LR 26-1(e)(1) sets for completing discovery, and means all discovery must be commenced in time to be completed by **November 15, 2021**.

~~3. **Interim Status Report:** The interim status report may be filed no later than September 16, 2021, which is not later than sixty (60) days before the discovery deadline.~~

1 4. **Amending the Pleadings and Adding Parties:** The last day to file motions to
2 amend pleadings or to add parties is **August 17, 2021**, which is not later than ninety (90) days
3 prior to the close of discovery.

4 5. **Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** The disclosure of experts and
5 expert reports shall occur by **September 16, 2021**, which is not later than sixty (60) days before
6 the discovery deadline. Disclosure of rebuttal experts and their reports shall occur by **October 18,**
7 **2021**, which is not later than thirty (30) days before the discovery deadline.

8 6. **Dispositive Motions:** Dispositive motions may be filed no later than **December**
9 **15, 2021**, which is thirty (30) days after the discovery deadline. In the event that the discovery
10 period is extended from the discovery cut-off date set forth in this Joint Discovery Plan and
11 Scheduling Order, the date for filing dispositive motions shall be extended for the same duration,
12 to be no later than thirty (30) days from the subsequent discovery cut-off date.

13 7. **Settlement:** In compliance with LR 26-1(b)(7), settlement has been considered
14 and discussed by the parties, as well as private mediation, as an alternative to the Court's ENE
15 conference should this matter not settle at the ENE.

16 8. **Pretrial Order:** The pretrial order shall be filed by **January 14, 2022**, which is
17 not later than the first business day after thirty (30) days following the date set for filing dispositive
18 motions. In the event dispositive motions are filed, the date for filing the joint pretrial order shall
19 be suspended until thirty (30) days after the decision of the dispositive motions or until further
20 order of the Court. In the further event that the discovery period is extended from the discovery
21 cut-off date set forth in this Joint Discovery Plan and Scheduling Order, the date for filing the joint
22 pretrial order shall be extended in accordance with the time period set forth in this paragraph.

23 9. **Later Appearing Parties:** A copy of this discovery plan and scheduling order
24 shall be served on any person served after it is entered or, if additional defendants should appear,
25 within five (5) days of their first appearance. This discovery plan and scheduling order shall apply
26 to such later appearing party, unless the Court, on motion and for good cause shown, orders
27 otherwise.

28 10. **Extensions or Modifications of the Discovery Plan and Scheduling Order:** In

1 accordance with Local Rule 26-4, a stipulation or motion for modification or extension of this
2 discovery plan and scheduling order and any deadline contained herein, must be made not later
3 than twenty-one (21) days before the subject deadline.

4 11. **Fed. R. Civ. P. 26(a)(3) Disclosures:** The disclosures required by Fed. R. Civ. P.
5 26(a)(3), and any objections thereto, shall be included in the pretrial order.

6 12. **Electronic Filing:** The attorneys of record in this matter are registered for
7 electronic filing with this Court. Any documents electronically filed with this Court are deemed
8 to be sufficiently served on the other party as of the date that the document is electronically filed
9 with the Court.

10 13. **Electronic Information:** The parties do not at this time anticipate any issues about
11 disclosures or discovery of electronically stored information, if any, including the form or forms
12 in which it should be produced. The parties shall meet and confer and otherwise work in good
13 faith with respect to the production of electronically stored information should any dispute arise.

14 14. **Privileged or Protected Documents:** The parties do not know of any issues
15 regarding claims of privilege or protection that need to be specifically addressed at this time.

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15. **Consent to Magistrate:** In compliance with LR 26-1(b)(8), the parties have considered consenting to the assigned Magistrate Judge, as well as the Short Trial Program. At this time, the parties do not consent to trial by the Magistrate Judge or to the use of the Court's Short Trial Program.

Dated this 16th day of June, 2021.

HUTCHINGS LAW GROUP, LLC

JACKSON LEWIS P.C.

/s/ Mark H. Hutchings

/s/ Holly W. Walker

Mark H. Hutchings, Bar No. 12783
552 E. Charleston Blvd.
Las Vegas, Nevada 89104

Paul T. Trimmer, Bar No. 9291
Holly E. Walker, Bar No. 14295
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101

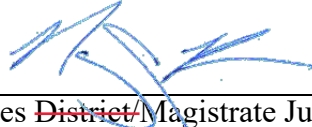
Attorneys for Plaintiff

*Attorneys for Defendant
M1 Support Services, L.P.*

Several of the rule citations herein are outdated or otherwise incorrect. Counsel must familiarize themselves with the current local rules, which became effective on April 17, 2020.

ORDER

IT IS SO ORDERED.


United States ~~District~~ Magistrate Judge

Date: June 17, 2021

4814-4482-6862, v. 1